

EXHIBIT A

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13 Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

16
17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 PACIFIC GAS AND ELECTRIC
21 COMPANY,

22 Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
IN SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED] hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I
3 could and would testify competently to the matters set forth herein.

4 2. I am a Distribution Troubleshooter with Pacific Gas and Electric Company ("PG&E").
5 One of the jobs of a Distribution Troubleshooter is to respond to assignments from PG&E Dispatch
6 to investigate and remedy reports of problems with PG&E service or equipment. These
7 assignments are called "field orders" or "tags." When Dispatch assigns a tag to a troubleshooter,
8 Dispatch gives a priority level—zero through three—to the tag. Under PG&E's response policies,
9 a priority one tag should be addressed on the same day it is assigned. Emergency or "zero" tags
10 require immediate action.

11 3. On July 13, 2021, at approximately 10:28 a.m., I received a non-emergency,
12 priority one tag with job code 2220 to reconnect power for a customer. I was familiar with the
13 location of this tag, as I had responded to an emergency tag for a damaged panel at the same
14 location several days earlier. At the time I received this tag, I was in Chico. I began driving
15 towards this location.

16 4. While en route, at approximately 10:47 a.m., I received another non-emergency,
17 priority one tag from Dispatch with job code 1240. In order to learn more about this tag, I called
18 the District Operator and was advised to check Fuse 805 on the Bucks Creek 1101 Line. Fuse 805
19 is located at the Cresta Dam on Highway 70. The site for the 2220 tag was on the way from Chico
20 to the Cresta Dam.

21 5. I arrived at the reconnect site by approximately 11:21 a.m. and indicated through
22 my PG&E Getac device that I was on site. I completed the work by approximately 11:43 a.m. and
23 proceeded to the dam.

24 6. I arrived at the Cresta Dam at approximately 12:30 p.m.. The power equipment at
25 the Dam was in a locked area that I could not access. However, I could see the equipment and was
26 able to determine that Fuse 805 had not blown. I then walked to the transformer located one span
27 away on the line that runs to the Dam. The meter on the transformer was off, indicating that the
28 power was out.

1 7. I then patrolled the area in an effort to discover the cause of the power outage. I did
2 not see anything at the Dam that appeared to be the source of the outage. Using my binoculars, I
3 visually inspected the distribution line, the Bucks Creek 1101 12kV Line, running towards the
4 source side device 17733 on the opposite side of the river. The Bucks Creek 1101 12kV Line is a
5 three-phase circuit, with each phase carried on a separate conductor. It appeared to me that all
6 poles and wires on the line were up and in their normal positions, not bent or twisted. However, I
7 could see what appeared to be a fuse hanging down from a pole on the circuit. That indicated to
8 me that the fuse may have tripped on at least one of the three phases of the line. At that point, I
9 did not see any vegetation on the line, nor did I see any smoke or other indication of fire.

10 8. When a fuse operates or "blows," it shuts off the power. When a fuse operates on a
11 power line, it hangs down like the one I believed might be visible through the binoculars. At a
12 house, you can throw a switch to turn a fuse back on; when a fuse operates on a power line, it
13 needs to be replaced with a new fuse. I returned to my vehicle so that I could drive up the hill to
14 inspect the possible hanging fuse. To access the fuse, I had to drive down Highway 70, cross the
15 river, and then drive up a long, narrow unpaved access road. The condition of the access road is
16 such that I was often able to drive no faster than approximately 3 miles per hour.

17 9. Approximately two miles from the location of the hanging fuse, I encountered a
18 Butte County road crew performing maintenance work on the bridge, blocking access to the only
19 road leading to the fuse. Portions of the bridge decking were missing, and it was impossible to
20 drive across. The workers told me that it would be about two hours before I could pass.

21 10. I then drove back down the access road to a location where I could get cell service.
22 At approximately 3:00 p.m., I reached an area with cell service and my Getac device reconnected
23 to the network. I received two priority zero emergency tags that were unrelated to the Cresta Dam
24 tag. I called the District Operator to ask if I should leave the area to attend to the priority zero tags
25 or stay to address the priority one tag. The District Operator advised me that other troubleshooters
26 were closer to the priority zero tags. We decided that I would stay in the area and wait for the
27 bridge to reopen.

1 11. I returned to the bridge, arriving at approximately 4:30 p.m. At that point, the road
2 crew had finished its work on the bridge for the day. There was a "road closed" sign before the
3 bridge, but I decided to cross anyway because the repairs that had been made at that point
4 appeared sufficient for me to cross safely with my truck.

5 12. I arrived at the pole at approximately 4:40 p.m. From my truck, I could see that
6 fuses on two of the phases/conductors were tripped, or open. The fuse on the third phase remained
7 closed. As I exited the truck, I could smell smoke but assumed it was coming from the Sugar Fire.
8 I got into the bucket of my truck to access the fuses in order to open the third fuse to prevent
9 "single phasing," which can cause damage to equipment. As I ascended in the bucket, I could see
10 a fire downhill from my position, about two-thirds of the way to the next pole. The fire was to the
11 left side of the right of way and roughly 600 or 800 square feet in an oval shape. The near edge of
12 the fire was not at the right of way; the far edge was roughly 25 yards from the right of way. I
13 could also see a tree leaning against the line. I did not see any breaks in the lines or damage to
14 other equipment.

15 13. I quickly opened the fuse on the third phase and then lowered the bucket to the
16 ground and radioed the dispatch operators in Rocklin and Chico for help. I did not hear any
17 response on the radio. Because I was not certain whether my call for help had been received, I
18 decided to attempt to fight the fire myself. I took a fire extinguisher from my truck and slid about
19 60-80 yards downhill to the location of the fire. I emptied the extinguisher but was unable to put
20 out the fire. I climbed back to the truck, where I could hear my supervisor trying to reach me on
21 the radio. I reported the location of the fire to my supervisor, and I understand that he called 9-1-
22 1. I then took a pressurized water extinguisher and a McLeod tool from my truck and continued to
23 try to fight the fire. After I emptied the extinguisher, I attempted to dig a fire break near the access
24 road. At this point, I would estimate the fire was about 1,200 square feet.

25 14. At approximately 5:30 p.m., I saw first a Cal Fire spotter plane and then a Cal Fire
26 helicopter and fixed-wing aircraft arrive and begin suppressing the fire. Around 7:00 p.m., a four-
27 man Cal Fire ground crew arrived. One of the men informed me that an additional ground crew
28 was on its way. The Cal Fire truck was not able to cross the closed bridge, so I drove to the bridge

1 in order to offer assistance in bringing the ground crew and their equipment to the fire. A PG&E
2 transmission supervisor named [REDACTED] arrived while I was at the bridge and I brought him
3 up to the site of the fire. After we returned to the bridge, a Cal Fire investigator arrived, and I
4 informed him of the two open fuses and the tree on the line. Around the same time, a ten-man Cal
5 Fire ground crew arrived. I asked if I could be of assistance, but they informed me that my help
6 was no longer needed. The transmission supervisor and I left the scene at approximately 8:00 p.m.
7 At that point, the fire appeared about three acres and to be contained.

8 I declare under penalty of perjury that the foregoing is true and correct to the best of my
9 knowledge.

10 Executed this 28th day of July, 2021, in the City of Chico, County of Butte, State of
11 California. [REDACTED]